

FILED
IN OPEN COURT
FOR THE
NOV 16 2017
CLERK, U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

-1-

COUNT ONE

Conspiracy To Provide Material Support to Terrorists
18 U.S.C. § 2339A

THE GRAND JURY CHARGES THAT:

From in or about November 2009 through on or about December 9, 2009, within the Eastern District of Virginia and elsewhere, the defendants,

AHMED AMEER MINNI,

RAMY SAID ZAMZAM,

AMAN HASSAN YEMER,

UMAR FAROOQ CHAUDHRY, and

WAQAR HUSSAIN KHAN,

and others known and unknown to the Grand Jury, did knowingly conspire and agree to provide material support and resources and to conceal the nature, location, source, and ownership of material support and resources, knowing and intending that they were to be used in preparation for, and in carrying out a violation of 18 U.S.C. § 956 (conspiracy to kill, maim, and injure persons or property in a foreign country), a violation of 18 U.S.C. § 1114 (the killing of and the attempted killing of an officer and employee of the United States and of an agency in a branch of the United States Government (including a member of the uniformed services) while such officer and employee was engaged in and on account of the performance of official duties, and a person assisting such an officer and employee in the performance of such duties, and on account of that assistance), and other violations enumerated in 18 U.S.C. § 2339A(a).

(In violation of Title 18, United States Code, Section 2339A)

COUNT TWO

Attempt To Provide Material Support to Terrorists
18 U.S.C. § 2339A

THE GRAND JURY FURTHER CHARGES THAT:

From in or about November 2009 through on or about December 9, 2009, within the Eastern District of Virginia and elsewhere, the defendants,

AHMED AMEER MINNI,

RAMY SAID ZAMZAM,

AMAN HASSAN YEMER,

UMAR FAROOQ CHAUDHRY, and

WAQAR HUSSAIN KHAN,

did knowingly attempt to provide material support and resources and to conceal the nature, location, source, and ownership of material support and resources, knowing and intending that they were to be used in preparation for, and in carrying out a violation of 18 U.S.C. § 956 (conspiracy to kill, maim, and injure persons or property in a foreign country), a violation of 18 U.S.C. § 1114 (the killing of and the attempted killing of an officer and employee of the United States and of an agency in a branch of the United States Government (including a member of the uniformed services) while such officer and employee was engaged in and on account of the performance of official duties, and a person assisting such an officer and employee in the performance of such duties, and on account of that assistance), and other violations enumerated in 18 U.S.C. § 2339A(a).

(In violation of Title 18, United States Code, Section 2339A)

COUNT THREE

Conspiracy To Provide Material Support to a Foreign Terrorist Organization
18 U.S.C. § 2339B

THE GRAND JURY FURTHER CHARGES THAT:

From in or about November 2009 through on or about December 9, 2009, within the Eastern District of Virginia and elsewhere, the defendants,

AHMED AMEER MINNI,

RAMY SAID ZAMZAM,

AMAN HASSAN YEMER,

UMAR FAROOQ CHAUDHRY, and

WAQAR HUSSAIN KHAN,

and others known and unknown to the Grand Jury, did knowingly conspire and agree to provide material support and resources (as defined in 18 U.S.C. § 2339A(b)(1)) to a designated foreign terrorist organization, that is, *Jaish-e-Mohammed* and *Lashkar-e-Tayyiba*.

(In violation of Title 18, United States Code, Section 2339B)

COUNT FOUR

Attempt To Provide Material Support to a Foreign Terrorist Organization
18 U.S.C. § 2339B

THE GRAND JURY FURTHER CHARGES THAT:

From in or about November 2009 through on or about December 9, 2009, within the Eastern District of Virginia and elsewhere, the defendants,

AHMED AMEER MINNI,

RAMY SAID ZAMZAM,

AMAN HASSAN YEMER,

UMAR FAROOQ CHAUDHRY, and

WAQAR HUSSAIN KHAN,

did knowingly attempt to provide material support and resources (as defined in 18 U.S.C. § 2339A(b)(1)) to a designated foreign terrorist organization, that is, *Jaish-e-Mohammed* and *Lashkar-e-Tayyiba*.

(In violation of Title 18, United States Code, Section 2339B)

A TRUE BILL:
Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office

Foreman

DANA J. BOENTE
UNITED STATES ATTORNEY

By: 

James R. Gillis

John T. Gibbs

Assistant United States Attorneys

Rebecca A. Magnone

Trial Attorney

Counterterrorism Section

National Security Division

U.S. Department of Justice